EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SECURITIES AND	§
EXCHANGE COMMISSION,	§
	§
Plaintiff,	§
	§
V.	§ CIVIL ACTION NO. 09-cv-1465-O
	§
BRION RANDALL, 2RANDALL	§
CONSULTING GROUP LLC,	§
TITAN HOME THEATER, LLC, AND	§
TITAN HOME SECURITY, LLC,	§
	§
Defendants.	§

DECLARATION OF MICHELLE McLELLAN

- 1. My name is Michelle McLellan. I am over the age of 21. I have never been convicted of a felony or a crime of moral turpitude. I am competent in all ways to make this declaration. The facts set forth herein are true and correct and based on my own personal knowledge.
- 2. On or about March 5, 2010, I appeared for my deposition pursuant to a subpoena issued by attorney Karen Cook. The subpoena was hand-delivered to me on February 25, 2010. I appeared for the deposition but I was not represented by counsel and attended the deposition without a lawyer. Ms. Cook did not tell me that I had the right to or needed to retain a lawyer for the deposition.
- 3. My deposition lasted for approximately five hours. The deposition was attended by several people and stenographically recorded by a court reporter. I do not know the court reporter's identity or employer. Exhibits were offered during the deposition. Prior to the conclusion of the deposition, I informed the court reporter that I wished to obtain a copy of the deposition transcript. Furthermore, in response to the court reporter's question, I also requested the opportunity to review the deposition for accuracy and to make any necessary changes. The court reporter has never contacted me or provided me with a copy of the deposition.
- 4. On or about March 29, 2010, Cook again contacted me and stated that she wished to continue the deposition. In response to Cook's request to continue the deposition, I retained the law firm of Munck Carter, LLP to represent me.

- 5. I was not informed prior to my deposition that I would not be permitted to review or obtain a copy of my own deposition testimony. Furthermore, no one conferred with me before requesting that my deposition be held under seal. Finally, I am aware of no reason that my deposition should be maintained under seal or that I should not be permitted to obtain a copy of the transcript and make any necessary changes to my testimony.
- 6. If the Court permits me to have a copy of my deposition, I will comply with all Court orders and reasonable limitations on the use or dissemination of my deposition testimony. For example, if the Court believes it necessary, I am willing to review the deposition only in the presence of my lawyers (and in the absence of third-parties) or in the Court's chambers with my counsel present.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15th day of April, 2010.

Michelle McLellan